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Davis Polk

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October 27, 2021

Re: Nexstar Media Inc., v. Comcast Cable Communications, LLC, No. 1:21-cv-06860-JGK

VIA ECF

The Honorable John G. Koeltl

United States District Court for the Southern District of New ARPLICATION GRANTED

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street

New York, NY 10007

Dear Judge Koeltl:

10/28/21 John G. Koeltl, U.S.D.J.

SO ORDERED

We represent defendant Comcast Cable Communications, LLC ("Comcast") in the above-referenced action. Pursuant to Rule VI.A.2 of Your Honor's Individual Practices, we respectfully submit this lettermotion for permission to redact certain confidential and competitively sensitive information from the publicly filed versions of the following documents, which we are submitting contemporaneously herewith:

- (i) Comcast's Reply Memorandum of Law in Further Support of its Motion to Stay or Dismiss the Complaint ("Reply"); and
- (ii) the Supplemental Declaration of Michael Nissenblatt in Further Support of Comcast's Motion to Stay or Dismiss the Complaint ("Supplemental Declaration").

Comcast also seeks permission to file under seal Exhibit 1 to the Supplemental Declaration, which is the December 31, 2019 retransmission consent agreement between Comcast and Nexstar Media Inc. ("Nexstar") (the "Comcast-Nexstar Agreement"), which consists of confidential and competitively sensitive contractual terms.

The parties have met and conferred, and Nexstar does not oppose Comcast's request.

Comcast previously filed a letter-motion on September 22, 2021, to redact discussions of the confidential and competitively sensitive terms of the Comcast-Nexstar Agreement, as well as discussions of confidential correspondence reflecting these terms. (See Dkt. No. 17.) Your Honor granted that motion on September 23, 2021. (Dkt. No. 24.) On October 13, 2021, Nexstar filed a letter-motion to redact discussion of the confidential terms of the Comcast-Nexstar Agreement and commercially sensitive discussions of communications with the Federal Communications Commission (the "FCC"). (See Dkt. No. 25.) Your Honor granted Nexstar's motion on October 14, 2021. (Dkt. No. 30.)

For the same reasons set forth in Comcast's and Nexstar's letter-motions to redact, Comcast seeks to redact or file under seal the commercially sensitive and non-public terms of the Comcast-Nexstar Agreement, as well as to redact commercially sensitive discussions of communications with the FCC and discussions of confidential and commercially sensitive correspondence reflecting the terms of the Comcast-Mission Agreement. (See Dkt. Nos. 17, 25.)

As required by Rule VI.A.2 of Your Honor's Individual Practices, Comcast respectfully submits herewith: (i) an unredacted copy of the Reply, which, if Comcast's application were granted, would remain under seal; (ii) a proposed public version of the Reply reflecting Comcast's requested redactions; (iii) an

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unredacted copy of the Supplemental Declaration and Exhibit 1 thereto, which, if Comcast's application were granted, would remain under seal; and (iv) a proposed public version of the Supplemental Declaration reflecting Comcast's requested redactions.

We are available to provide any additional information that would help facilitate the Court's disposition of this request. We thank the Court for its consideration.

Respectfully submitted,

/s/ Dana M. Seshens

Dana M. Seshens

cc: All counsel of record (via ECF)